

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS and VERIZON CORPORATE
SERVICES GROUP, INC.,

Defendants.

Case No. 2:23-CV-00352-JRG-RSP

JOINT MOTION TO DISMISS

Plaintiff Headwater Research LLC (“Headwater” or “Plaintiff”) and Defendants Cellco Partnership, d/b/a Verizon Wireless and Verizon Corporate Services Group Inc. (collectively, “Verizon” or “Defendants”), (together, the “Parties”) have resolved Plaintiff’s claims for relief against Defendants and Defendants’ counterclaims for relief against Plaintiff asserted in Count 2 of Plaintiff’s complaint, which state claims for infringement of U.S. Patent No. 8,924,543. Accordingly, the Parties respectfully jointly move to dismiss with prejudice Headwater’s claims pursuant to Count 2 against Verizon and dismiss without prejudice Verizon’s counterclaims and defenses as to Headwater’s Count 2. The Parties further request that all attorneys’ fees, costs of court, and expenses be borne by each Party incurring the same.

Dated: January 29, 2025

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CERTIFICATE OF CONFERENCE

I certify that the Parties have met and conferred in compliance with Local Rule CV 7(h) regarding this Motion, and this Motion is agreed.

/s/ Katherine Q. Dominguez
Katherine Q. Dominguez

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 29th day of January, 2025.

/s/ Katherine Q. Dominguez
Katherine Q. Dominguez